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Attorneys for Uber
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**OPPOSITION TO MOTION TO
WITHDRAW AS COUNSEL OF RECORD**

This Document Relates to:

V.B. vs. Uber Technologies, Inc., et al.,
3:25-cv-06705;

M.W. vs. Uber Technologies, Inc., et al.,
3:25-cv-05474

E.B. vs. Uber Technologies, Inc., et al.,
3:24-cv-07491

Judge: Hon. Charles R. Breyer
Date: TBD
Time: TBD
Courtroom: 6 – 17th Floor

1 The Court should deny Pulaski's Motion to Withdraw as Counsel of Record (ECF 3891) for the
2 above-referenced Plaintiffs (MDL IDs 2642, 3841, and 3659), each of whom is subject to Uber's August
3 28, 2025 Motion for Entry of an Order to Show Cause Why 6 Plaintiffs Who Have Submitted Non-Bona
4 Fide Receipts Should Not Be Dismissed with Prejudice (ECF 3784, the "Second Receipts Motion").

5 In an August 26, 2025 Order (ECF 3759, the "Order"), this Court denied a similar motion to
6 withdraw by counsel for Plaintiffs subject to Uber's First Receipts Motion filed on July 30, 2025 (ECF
7 3604).¹ The Court stated in the Order:

8 The Motions to Withdraw as Counsel in the above-captioned cases are denied without
9 prejudice pending the resolution of Uber's Motion for Entry of an Order to Show Cause.
10 The plaintiffs in these cases are alleged to have submitted fraudulent ride receipts; such
11 action could potentially result in a variety of penalties, including but not limited to
12 dismissal of plaintiffs' claims with prejudice and sanctions against plaintiffs' counsel.
Given the seriousness of the potential repercussions of Uber's pending motion, it would be
prejudicial both to plaintiffs as well as Uber to allow counsel to withdraw so soon before
that dispute can be resolved. (ECF 3759)

13 For the same reasons stated in the Court's Order, Uber requests that it deny Pulaski's Motion to
14 Withdraw without prejudice, pending the resolution of the Second Receipts Motion.

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27 ¹ For clarity, Uber has filed two Receipts Motions. The First Receipts Motion, filed on July 30, 2025 (ECF 3604), was
28 resolved by this Court on September 9, 2025 (ECF 3876). Uber's Second Receipts Motion, filed on August 28, 2025 (ECF
3784). The Motion to Withdraw currently at issue relates to three Plaintiffs subject to the Second Receipts Motion.

1 DATED: September 12, 2025

Respectfully submitted,

3 /s/ Laura Vartain Horn

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